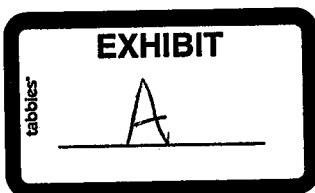


Case Number:	A 2103016
Court:	Common Pleas Civil
Case Caption:	ZELDA GARRETT vs. KLLM TRANSPORT SERVICES LLC
Judge:	TOM HEEKIN
Filed Date:	08/26/2021
Case Type:	C311 - OTHER TORT- PERSONAL INJURY
Total Deposits:	\$355.00 Credit
Total Costs:	\$277.50

Case Documents

Show All Rows

Date Filed	Document Type	Pages
09/13/2021	Service Return	1
09/10/2021	Notification Form	1
09/10/2021	Notice	2
09/06/2021	Service Return	1
08/27/2021	Summons	1
08/27/2021	Summons	1
08/27/2021	Summons	1
08/26/2021	Written Request	1
08/26/2021	Initial Filing	6
08/26/2021	Classification Form	1



ACIAD POREVAL
1000 MAIN STREET
CINCINNATI OH
COMMON PLEAS
A 2103016 D 1

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08/27/2021 ZIP 45202
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7194 5168 6310 0946 5580

08/27/2021 SUMMONS & COMPLAINT
KLLM TRANSPORT SERVICES LLC
135 RIVERVIEW DRIVE
RICHLAND MS 39218

KLLM 9591

COPY

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

ZELDA GARRETT
PLAINTIFF

-- VS --

Use below number on
all future pleadings

No. A 2103016
SUMMONS

KLLM TRANSPORT SERVICES LLC
DEFENDANT

KLLM TRANSPORT SERVICES LLC
135 RIVERVIEW DRIVE
RICHLAND MS 39218

D - 1

You are notified
that you have been named Defendant(s) in a complaint filed by

ZELDA GARRETT
114 BAVARIAN STREET
APT G
MIDDLETOWN OH 45044

Plaintiff(s)

in the Hamilton County, COMMON PLEAS CIVIL Division,
AFTAB PUREVAL, 1000 MAIN STREET ROOM 315,
CINCINNATI, OH 45202.

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff, if he/she has no attorney of record, a copy of an answer to the complaint within twenty-eight (28) days after service of this summons on you, exclusive of the day of service. Your answer must be filed with the Court within three (3) days after the service of a copy of the answer on the plaintiff's attorney.

Further, pursuant to Local Rule 10 of Hamilton County, you are also required to file a Notification Form to receive notice of all future hearings.

If you fail to appear and defend, judgement by default will be rendered against you for the relief demanded in the attached complaint.

Name and Address of attorney
WILLIAM P ALLEN
3420 ATRIUM BLDG
MIDDLETOWN OH 45005

AFTAB PUREVAL
Clerk, Court of Common Pleas
Hamilton County, Ohio

By RICK HOFMANN

Deputy

Date: August 27, 2021



D132802092



**AFTAB PUREVAL
HAMILTON COUNTY CLERK OF COURTS**

COMMON PLEAS DIVISION

**ELECTRONICALLY FILED
August 26, 2021 12:48 PM**

**AFTAB PUREVAL
Clerk of Courts
Hamilton County, Ohio
CONFIRMATION 1102654**

ZELDA GARRETT

A 2103016

vs.

**KLLM TRANSPORT
SERVICES LLC**

**FILING TYPE: INITIAL FILING (OUT OF COUNTY) WITH NO JURY
DEMAND**

PAGES FILED: 6

EFR200

IN THE COURT OF COMMON PLEAS, HAMILTON COUNTY, OHIO
GENERAL DIVISION

ZELDA GARRETT
114 Bavarian Street, Apartment G
Middletown, Ohio 45044

Case No. _____

Judge _____

SPENCER GARRETT
114 Bavarian Street, Apartment G
Middletown, Ohio 45044

COMPLAINT FOR
PERSONAL INJURIES

Plaintiffs,

v.

KLLM TRANSPORT SERVICES, LLC
135 Riverview Drive
Richland, Mississippi 39218

and

CURTIS HOLLOWAY
130 Devon Building 8, Apt 4
Jackson, Mississippi 39204

And

GOVERNMENT EMPLOYEES HEALTH
ASSOCIATION – GEHA
310 NE Mulberry Street
Lee's Summit, Missouri 64086

Defendants

FIRST CLAIM FOR RELIEF

1. On or about September 19, 2019, at approximately 6:01 p.m., Plaintiff, Zelda Garrett, was operating her 2018 Chevrolet Malibu southbound on Interstate 75 ("I-75") in the village of Lockland, Hamilton County, Ohio. At all times relevant herein, Plaintiff, Zelda Garrett, was exercising due care for her own safety, and the safety of other motorists in lawful use of the roadway.
2. At or about the same time and place Defendant, Curtis Holloway, was operating his employers 2020 Cascadia Freightliner semi-tractor with a trailer attached southbound on I-75. At this location Southbound I-75 consists of 3 southbound lanes. Zelda Garrett was in the centermost lane. Curtis Holloway was in the leftmost lane when he negligently failed to remain in his lane of travel, violently striking the driver's side of the Garrett vehicle. Thereafter, Garrett's vehicle came to rest perpendicular to the southbound lanes of travel with the front of the Freightliner against the driver's side of her vehicle.
3. Defendant Holloway was negligent. His negligence includes but is not limited to; failing to maintain/remain in his lane of travel; improper lane change; failing to keep a safe lookout; failing to control his vehicle so as to avoid colliding with Plaintiff's vehicle; driver inattention; and he was otherwise negligent.
4. The negligent acts and/or omissions of Defendant, Holloway, were a violation of Ohio Revised Code 4511.25, as well as other state and local ordinances, which constitutes negligence per se.
5. As a direct and proximate result of the negligence of Defendant Holloway, Plaintiff, Zelda Garrett, sustained serious injuries requiring multiple hospitalizations and surgeries, including but not limited to, injuries to her left shoulder, knee, hand, and back.

Plaintiff, Zelda Garrett, has experienced and will continue to experience pain and discomfort from time to time and has endured a loss of ability to perform the usual and specific activities of life, which conditions may be permanent in nature. She has suffered emotional distress including, but not limited to anxiety and post-traumatic stress disorder. She has lost wages and suffered an impairment of earning capacity in an amount to be determined. She has incurred property damage and diminished value to her vehicle and personal items. Her injuries and damages are permanent and ongoing.

6. As a direct and proximate result of the negligence of Defendant, Holloway, Plaintiff Garrett has incurred medical expenses for the care and treatment of her injuries in an amount to be determined and will continue to incur such expenses in the future from time to time.

SECOND CLAIM FOR RELIEF

7. Plaintiff, Zelda Garrett adopts all of the foregoing allegations in the foregoing claims for relief as if fully rewritten at length herein.
8. Curtis Holloway was an agent, servant, or employee of KLLM Transport Services, LLC (hereinafter "KLLM"). As Curtis Holloway's employer, KLLM, is liable for Plaintiff Garrett's damages under the doctrine of *respondeat superior*, *agency*, and/or *master/servant*. As a direct and proximate result of KLLM's negligence, Plaintiff, Zelda Garrett, suffered the injuries and damages set forth herein.
9. KLLM was also negligent. Their negligence includes, but is not limited to negligent hiring, training, supervising, and retention of Holloway.

THIRD CLAIM FOR RELIEF

10. Plaintiff, Zelda Garrett adopts all of the foregoing allegations in the foregoing claims for relief as if fully rewritten at length herein.
11. Defendant, Government Employees Health Association (hereinafter "GEHA"), is a health insurance company providing health insurance coverage under the insurance laws of the State of Ohio. Defendant, GEHA may have provided health insurance to Plaintiff, Zelda Garrett, for treatment of injuries necessitated by the aforesaid motor vehicle collision. Defendant, GEHA, may claim a right of subrogation, and/or a right of recovery, and/or right of reimbursement from Plaintiffs and/or Defendants as to the amounts it may have paid or may in the future pay on the behalf of Plaintiff Garrett, if any.

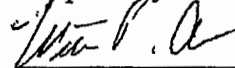
FOURTH CLAIM FOR RELIEF

12. Plaintiff, Spencer Garrett, adopts all of the allegations in the foregoing claims for relief as if fully rewritten at length herein.
13. Plaintiff, Spencer Garrett, is and was at all pertinent times herein, the spouse of Plaintiff, Zelda Garrett. He is responsible for the medical bills incurred by his spouse.
14. As a direct and proximate result of the collision and injuries to his wife, Spencer Garrett has lost the care, companionship, services, and consortium of his spouse, which loss may be permanent in nature.

WHEREFORE in her First and Second Claims for Relief, Plaintiff Zelda Garrett, demands judgment against Defendants Curtis Holloway and KLLM in an amount in excess of \$25,000.00; and in her Third Claim for Relief, Plaintiff, Zelda Garrett, demands Defendant GEHA set forth its claim for subrogation and/or right of recovery and/or right

of reimbursement or be forever barred from making any claims against any party hereto; and in his Fourth Claim for Relief, Plaintiff Spencer Garrett, demands judgment against Defendant Curtis Holloway and KLLM in an amount in excess of \$25,000.00. Plaintiffs further demand all other relief to which they may be entitled including costs and interest herein and for such other and further relief as may be necessary and proper.

Respectfully Submitted,



William P. Allen, Esq. (#0064046)
Trial Attorney for Plaintiffs
Casper & Casper
3735 S. Dixie Highway
Middletown, OH 45042
(513) 424-2401 (phone)
(513) 800-1316 (fax)
wallen@casperlaws.com

INSTRUCTIONS FOR SERVICE

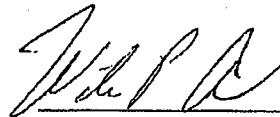
TO THE CLERK:

Please issue service of summons, together with a copy of the foregoing Complaint by certified mail service, return receipt requested upon the following:

KLLM TRANSPORT SERVICES, LLC
135 Riverview Drive
Richland, Mississippi 39218

CURTIS HOLLOWAY
130 Devon Building 8, Apt 4
Jackson, Mississippi 39204

GOVERNMENT EMPLOYEES HEALTH
ASSOCIATION – GEHA
310 NE Mulberry Street
Lee's Summit, Missouri 64086



William P. Allen



**AFTAB PUREVAL
HAMILTON COUNTY CLERK OF COURTS**

COMMON PLEAS DIVISION

**ELECTRONICALLY FILED
August 26, 2021 12:48 PM
AFTAB PUREVAL
Clerk of Courts
Hamilton County, Ohio
CONFIRMATION 1102654**

ZELDA GARRETT

A 2103016

vs.

**KLLM TRANSPORT
SERVICES LLC**

FILING TYPE: CLASSIFICATION

PAGES FILED: 1

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIOCLASSIFICATION FORM
WWW.COURTCLERK.ORGAFTAB PUREVAL
CLERK OF COURTSCASE NUMBER: _____ PLAINTIFF: Zelda Garrett

PURSUANT TO SUPERINTENDENCE RULE 4, THIS CASE WAS ORIGINALLY FILED AND DISMISSED

UNDER CASE NUMBER: _____ BY JUDGE _____

PLEASE INDICATE CLASSIFICATION INTO WHICH THIS CASE FALLS (please only check one):

- | | |
|--|---|
| <input type="checkbox"/> Other Tort – C360 | <input type="checkbox"/> Other Civil – H700-34 |
| <input checked="" type="checkbox"/> Personal Injury – C310 | <input type="checkbox"/> Appropriation – H710 |
| <input type="checkbox"/> Wrongful Death – C320 | <input type="checkbox"/> Accounting – H720 |
| <input type="checkbox"/> Vehicle Accident – C370 | <input type="checkbox"/> Beyond Jurisdiction – 730 |
| <input type="checkbox"/> Professional Tort – A300 | <input type="checkbox"/> Breach of Contract – 740 |
| <input type="checkbox"/> Personal Injury – A310 | <input type="checkbox"/> Cancel Land Contract – 750 |
| <input type="checkbox"/> Wrongful Death – A320 | <input type="checkbox"/> Change of Venue – H760 |
| <input type="checkbox"/> Legal Malpractice – A330 | <input type="checkbox"/> Class Action – H770 |
| <input type="checkbox"/> Medical Malpractice – A340 | <input type="checkbox"/> Convey Declared Void – H780 |
| <input type="checkbox"/> Product Liability – B350 | <input type="checkbox"/> Declaratory Judgment – H790 |
| <input type="checkbox"/> Personal Injury – B310 | <input type="checkbox"/> Discharge Mechanics Lien – H800 |
| <input type="checkbox"/> Wrongful Death – B320 | <input type="checkbox"/> Dissolve Partnership – H810 |
| <input type="checkbox"/> Worker's Compensation | <input type="checkbox"/> CONSUMER SALES ACT (1345 ORC) – H820 |
| <input type="checkbox"/> Non-Compliant Employer – D410 | <input type="checkbox"/> Check here if relief includes declaratory judgment, injunction or class action recovery – H825 |
| <input type="checkbox"/> Appeal – D420 | <input type="checkbox"/> Habeas Corpus – H830 |
| <input type="checkbox"/> Administrative Appeals – F600 | <input type="checkbox"/> Injunction – H840 |
| <input type="checkbox"/> Appeal Civil Service – F610 | <input type="checkbox"/> Mandamus – H850 |
| <input type="checkbox"/> Appeal Motor Vehicle – F620 | <input type="checkbox"/> On Account – H860 |
| <input type="checkbox"/> Appeal Unemployment – F630 | <input type="checkbox"/> Partition – H870 |
| <input type="checkbox"/> Appeal Liquor – F640 | <input type="checkbox"/> Quiet Title – H880 |
| <input type="checkbox"/> Appeal Taxes – F650 | <input type="checkbox"/> Replevin – H890 |
| <input type="checkbox"/> Appeal Zoning – F660 | <input type="checkbox"/> Sale of Real Estate – H900 |
| <input type="checkbox"/> Certificate of Qualification – H600 | <input type="checkbox"/> Specific Performance – 910 |
| | <input type="checkbox"/> Restraining Order – H920 |
| | <input type="checkbox"/> Testimony – H930-21 |
| | <input type="checkbox"/> Environmental – H940 |
| | <input type="checkbox"/> Cognovit – H950 |
| | <input type="checkbox"/> Menacing by Stalking – H960 |
| | <input type="checkbox"/> Repo Title – Transfer of Title Only – 970 |
| | <input type="checkbox"/> Court Ordered Title – H980 |
| | <input type="checkbox"/> Injunction Sexual Predator – 990 |
| | <input type="checkbox"/> SB 10 – Termination – H690 |
| | <input type="checkbox"/> SB 10 – Reclassification – H697 |

DATE: 08/26/2021ATTORNEY (PRINT): William P. AllenOHIO SUPREME COURT NUMBER: 0064046



**AFTAB PUREVAL
HAMILTON COUNTY CLERK OF COURTS**

COMMON PLEAS DIVISION

**ELECTRONICALLY FILED
August 26, 2021 12:48 PM
AFTAB PUREVAL
Clerk of Courts
Hamilton County, Ohio
CONFIRMATION 1102654**

ZELDA GARRETT

A 2103016

vs.

**KLLM TRANSPORT
SERVICES LLC**

**FILING TYPE: WRITTEN REQUEST FOR SERVICE (CERTIFIED
MAIL)**

PAGES FILED: 1



COMMON PLEAS COURT
HAMILTON COUNTY, OHIO

Zelda Garrett

CASE NO. _____

VS

DOCUMENT TO BE SERVED & ITS FILED DATE

KLLM Transport Services. LLC

PLAINTIFF/DEFENDANT REQUESTS:



CERTIFIED MAIL SERVICE



EXPRESS MAIL SERVICE



PERSONAL SERVICE



REGULAR MAIL SERVICE



PROCESS SERVICE



RESIDENCE SERVICE



REGISTERED INTERNATIONAL



FOREIGN SHERIFF

ON:

1) KLLM Transport Services, LLC
135 Riverview Drive
Richland, Mississippi 39218

3) Government Employees Health Assoc
310 NE Mulberry Street
Lee's Summit Missouri 64085

2) Curtis Holloway
130 Devon Building 8
Apt 4
Jackson, Mississippi 39204

4) _____

William P. Allen

ATTORNEY

3735 S. Dixie Highway Middletown Oh 45005

ADDRESS

513-424-2401

PHONE NUMBER

0064046

ATTORNEY NUMBER

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

ZELDA GARRETT
PLAINTIFF

-- vs --

KLLM TRANSPORT SERVICES LLC
DEFENDANT

Use below number on
all future pleadings

No. A 2103016
SUMMONS

GOVERNMENT EMPLOYEES HEALTH ASSOCIATION
310 NE MULBERRY STREET
LEES SUMMIT MO 64086

D - 3

You are notified
that you have been named Defendant(s) in a complaint filed by

ZELDA GARRETT
114 BAVARIAN STREET
APT G
MIDDLETOWN OH 45044

Plaintiff(s)

in the Hamilton County, COMMON PLEAS CIVIL Division,
AFTAB PUREVAL, 1000 MAIN STREET ROOM 315,
CINCINNATI, OH 45202.

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff, if he/she has no attorney of record, a copy of an answer to the complaint within twenty-eight (28) days after service of this summons on you, exclusive of the day of service. Your answer must be filed with the Court within three (3) days after the service of a copy of the answer on the plaintiff's attorney.

Further, pursuant to Local Rule 10 of Hamilton County, you are also required to file a Notification Form to receive notice of all future hearings.

If you fail to appear and defend, judgement by default will be rendered against you for the relief demanded in the attached complaint.

Name and Address of attorney
WILLIAM P ALLEN
3420 ATRIUM BLDG
MIDDLETOWN OH 45005

AFTAB PUREVAL
Clerk, Court of Common Pleas
Hamilton County, Ohio

By RICK HOFMANN

Deputy

Date: August 27, 2021



D132802107



VERIFY RECORD

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

ZELDA GARRETT
PLAINTIFF

-- vs --

Use below number on
all future pleadings

No. A 2103016
SUMMONS

KLLM TRANSPORT SERVICES LLC
DEFENDANT

KLLM TRANSPORT SERVICES LLC
135 RIVERVIEW DRIVE
RICHLAND MS 39218

D - 1

You are notified
that you have been named Defendant(s) in a complaint filed by

ZELDA GARRETT
114 BAVARIAN STREET
APT G
MIDDLETOWN OH 45044

Plaintiff(s)

in the Hamilton County, COMMON PLEAS CIVIL Division,
AFTAB PUREVAL, 1000 MAIN STREET ROOM 315,
CINCINNATI, OH 45202.

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Name and Address of attorney
WILLIAM P ALLEN
3420 ATRIUM BLDG
MIDDLETOWN OH 45005

AFTAB PUREVAL
Clerk, Court of Common Pleas
Hamilton County, Ohio

By RICK HOFMANN

Deputy

Date: August 27, 2021



D132802092



VERIFY RECORD

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

ZELDA GARRETT
PLAINTIFF

Use below number on
all future pleadings

-- VS --

No. A 2103016
SUMMONS

KLLM TRANSPORT SERVICES LLC
DEFENDANT

CURTIS HOLLOWAY
130 DEVON BUILDING 8 APT 4
JACKSON MS 39204

D - 2

You are notified
that you have been named Defendant(s) in a complaint filed by

ZELDA GARRETT
114 BAVARIAN STREET
APT G
MIDDLETOWN OH 45044

Plaintiff(s)

in the Hamilton County, COMMON PLEAS CIVIL Division,
AFTAB PUREVAL, 1000 MAIN STREET ROOM 315,
CINCINNATI, OH 45202.

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff, if he/she has no attorney of record, a copy of an answer to the complaint within twenty-eight (28) days after service of this summons on you, exclusive of the day of service. Your answer must be filed with the Court within three (3) days after the service of a copy of the answer on the plaintiff's attorney.

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Name and Address of attorney
WILLIAM P ALLEN
3420 ATRIUM BLDG
MIDDLETOWN OH 45005

AFTAB PUREVAL
Clerk, Court of Common Pleas
Hamilton County, Ohio

By RICK HOFMANN

Deputy

Date: August 27, 2021



D132802102



VERIFY RECORD



ELECTRONIC CERTIFIED MAIL SERVICE RETURN
SUMMONS & COMPLAINT
A 2103016 D1
KLLM TRANSPORT SERVICES LLC
FILED: 09/06/2021 6:54:54

Date Produced: 09/06/2021

HAMILTON COUNTY CLERK OF COURTS:

The following is the delivery information for Certified Mail™ item number 7194 5168 6310 0946 5580. Our records indicate that this item was delivered on 08/30/2021 at 02:50 p.m. in RICHLAND, MS 39218. The scanned image of the recipient information is provided below.

Signature of Recipient :

C Smith
KRIH

Address of Recipient :

130 River View

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Sincerely,
United States Postal Service

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Customer Reference Number: 16548514SEQ1

**IN THE COURT OF COMMON PLEAS, HAMILTON COUNTY, OHIO
GENERAL DIVISION**

ZELDA GARRETT and
SPENCER GARRETT,

NO.: A 2103016

Plaintiffs,

NOTICE OF APPEARANCE

v.

KLLM TRANSPORT SERVICES, LLC and
CURTIS HOLLOWAY,

JURY TRIAL DEMANDED HEREIN

Defendants.

Kindly enter the appearance of John T. Pion, Esquire, Jordan C. Hettrich, Esquire, and Pion, Nerone, Girman, Winslow & Smith, P.C., on behalf of Defendants, KLLM Transport Services, LLC and Curtis Holloway, in the above matter.

Respectfully submitted,

PION, NERONE, GIRMAN, WINSLOW
& SMITH, P.C.

By: /s/ Jordan C. Hettrich

John T. Pion, Esquire

OHSB #0070722

jpion@pionlaw.com

Jordan C. Hettrich, Esq.

OHSB #0091744

jhettrich@pionlaw.com

1500 One Gateway Center

Pittsburgh PA 15222

412-281-2288

Counsel for Defendants,

KLLM Transport Services, LLC and

Curtis Holloway



VERIFY RECORD

CERTIFICATE OF SERVICE

I, Jordan C. Hettrich, Esquire, hereby certify that a true and correct copy of the foregoing NOTICE OF APPEARANCE was served upon counsel of record email, this 10th day of September, 2021, as follows:

William P. Allen, Esquire (#0064046)
Casper & Casper
3735 S. Dixie Highway
Middletown, OH 45042
wallen@casperlaw.com
Counsel for Plaintiffs

PION, NERONE, GIRMAN, WINSLOW
& SMITH, P.C.

By: /s/ Jordan C. Hettrich
Jordan C. Hettrich, Esq.
OHSB #0091744
jhettrich@pionlaw.com



Aftab Pureval, Clerk of Courts
Court of Common Pleas, Hamilton County, Ohio
www.courtclerk.org

NOTIFICATION FORM

CASE INFORMATION

Date: September 10, 2021

Case No.: A 2103016

Caption: Zelda Garrett and Spencer Garrett vs KLLM Transport Services, LLC and Curtis Holloway

ATTORNEY INFORMATION

Attorney Name: Jordan C. Hettrich / John T. Pion

Attorney Address: Pion, Nerone, Girman, Winslow & Smith, PC
Firm
1500 One Gateway Center, 420 Fort Duquesne Boulevard
Street Number
Pittsburgh, PA 15222
City, State, Zip
412-281-2288
Phone Number
412-281-3388
Fax Number
jhettrich@pionlaw.com / jpion@pionlaw.com
E-Mail Address

Ohio Attorney Supreme Court No.: 0091744 / 0070722

☐ Address Change Only

☒ Request Case Notification / Not a Party Defendant

COURT PARTY INFORMATION

Name of Client: KLLM Transport Services, LLC

☐ Plaintiff ☒ Defendant

Name of Client: Curtis Holloway

☐ Plaintiff ☒ Defendant

Name of Client:

☐ Plaintiff ☐ Defendant

Name of Client:

☐ Plaintiff ☐ Defendant

Name of Client:

☐ Plaintiff ☐ Defendant

Substituted for: (if applicable)

45202
CIVIL

CERTIFIED MAIL

08/24/2021
US POSTAGE \$006.9



ZIP 45:
041L122C



7194 5168 6310 0946 5597

08/27/2021 SUMMONS & COMPLAINT
CURTIS HOLLOWAY
130 DEVON BUILDING 8 APT 4
JACKSON MS 39204



D132923867

non

XIE 326 SE 1 7209/03/21
RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD
45202128790 2247N246231-00481



VERIFY RECORD